

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

Bky No. 09-50779

In re:

Dennis E. Hecker,

**NOTICE OF HEARING AND MOTION FOR
ORDER AUTHORIZING RULE 2004
EXAMINATIONS**

Debtor.

1. Randall L. Seaver, the Chapter 7 Trustee of the above-captioned bankruptcy estate ("Trustee"), applies to the court for authorization to conduct Bankruptcy Rule 2004 examinations. The examinations for which authorization is sought are those of Jessica Robb, Harrison Prather, Harrison K-9 Security, LLC, Bellagio Las Vegas, Mirage Las Vegas, Gittleman Management Corporation, R.W. LLC, Downtown Resource Group, Holly Hecker-Aldridge and Breck School.

2. The Court will hold a hearing on this motion at 9:30 a.m. on September 16, 2009, in Courtroom 8 West, U.S. Bankruptcy Court, 300 South Fourth Street, Minneapolis, MN 55415.

3. Any response to this motion must be filed and served by delivery not later than September 11, 2009 which is three days before the time set for the hearing (excluding Saturdays, Sundays and holidays), or filed and served by mail not later than September 40, 2009 which is seven days before the time set for the hearing (excluding Saturdays, Sundays and holidays).
UNLESS A RESPONSE OPPOSING THE MOTION IS TIMELY FILED, THE COURT MAY GRANT THE MOTION WITHOUT A HEARING.

4. This case was commenced by the filing of a voluntary petition under Chapter 7 on June 4, 2009. The case is currently pending in this court. This court has jurisdiction over this application pursuant to 28 U.S.C. §157 and 1334, Bankruptcy Rule 5005 and Local Rule 1070-1.

This proceeding is a core proceeding. This Application arises under Bankruptcy Rule 2004.

This Application is filed under Local Rule 2004-1(a).

5. The individuals and entities for which Rule 2004 discovery examination authorization is sought are believed to have information relating to the Debtor's financial affairs. The connections and information of those individuals and entities known by the Trustee at this time are as follows:

- a. Jessica Robb. According to Mr. Hecker's attorney, Mr. Hecker transferred a ring to Mrs. Robb in May, 2008. Mr. Hecker had apparently purchased the ring for \$154,000. Additionally, according to Mr. Hecker's schedules, he transferred cash to Mrs. Robb in the year prior to filing.
- b. Harrison Prather and Harrison K-9 Security, LLC. The Debtor purchased dogs from Harrison K-9. Harrison Prather is the principal of that entity. It appears that Mr. Hecker purchased a dog as recently as February, 2009 and paid Harrison K-9 Security over \$30,000 at that time.
- c. Bellagio Las Vegas. It appears that the Debtor may have received \$275,000 in chips from Bellagio in April, 2009. It would have further information regarding the Debtor's business or financial affairs.
- d. Mirage Las Vegas. It appears that the Debtor may have received \$250,000 in chips from the Mirage in April, 2009. It would have further information regarding the Debtor's business or financial affairs.
- e. Gittleman Management Corporation. This entity may have information regarding the Debtor's financial affairs relating to a lease to Christi Rowan.
- f. R.W. LLC. This entity may have information regarding the Debtor's financial affairs relating to a lease to Christi Rowan.
- g. Downtown Resource Group. This entity may have information regarding the Debtor's financial affairs relating to a lease to Christi Rowan.
- h. Holly Hecker-Aldridge. Ms. Hecker-Aldridge is the Debtor's daughter. She may possess knowledge about financial affairs pertinent to this bankruptcy case.
- i. Breck School. The Debtor's children have attended this school. This entity has information relating to the Debtor's financial affairs.

6. The Trustee needs to obtain information from above individuals and entities so that he can determine the assets of this bankruptcy estate and administer the estate.

WHEREFORE, the Trustee requests that the court enter an order approving the Trustee's examination, pursuant to Bankruptcy Rule 2004, of Jessica Robb, Harrison Prather, Harrison K-9 Security, LLC, Bellagio Las Vegas, Mirage Las Vegas, Gittleman Management Corporation, R.W. LLC, Downtown Resource Group, Hecker-Aldridge and Breck School.

**LEONARD, O'BRIEN
SPENCER, GALE & SAYRE, LTD.**

/e/ Matthew R. Burton

Dated: September 2, 2009

By _____
Matthew R. Burton, #210018
Attorneys for Brian F. Leonard, Trustee
100 South Fifth Street, Suite 2500
Minneapolis, Minnesota 55402-1234
(612) 332-1030

VERIFICATION

I, Randall L. Seaver, the Chapter 7 Trustee in the above-captioned matter state under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on September 2, 2009

/s/ Randall L. Seaver

Randall L. Seaver, Trustee

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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

BKY No. 09-50779

In re:

Chapter 7

Dennis E. Hecker,

Debtor.

UNSWORN CERTIFICATE OF SERVICE

I hereby certify that on September 2, 2009, I caused the following documents:

Notice of Hearing and Motion for Order Authorizing Rule 2004 Examinations and Order (proposed)

to be filed electronically with the Clerk of Court through ECF, and that ECF will send an e-notice of the electronic filing to the following:

- Patti H Bass ecf@bass-associates.com
- Bruce H. Carlson bruce.carlson@mlcfargolaw.com, tricia.fossen@mlcfargolaw.com
- Monica L. Clark clark.monica@dorseylaw.com
- Gordon B. Conn conn@kwgc-law.com
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- Brad A Sinclair bsinclair@serklandlaw.com, crohr@serklandlaw.com
- Matthew A Swanson matthew.swanson@leonard.com, callie.sanford@leonard.com
- US Trustee ustpreion12.mn.ecf@usdoj.gov

I further certify that I caused a copy of the foregoing documents to be mailed by first class mail, postage paid, to the following:

SEE ATTACHED SERVICE LIST

Dated: September 2, 2009

/e/ Stephanie Wood

Stephanie Wood
100 South Fifth Street, Suite 2500
Minneapolis, MN 55402
(612) 332-1030

406460

DENNIS E. HECKER
BKY CASE NO.: 09-50779

SERVICE LIST

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Minneapolis, MN 55402

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Harrison K-9 Security, LLC
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Aiken, South Carolina 29802

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3600 Las Vegas Blvd
Las Vegas, NV 89109

Mirage Las Vegas
3400 Las Vegas Blvd
Las Vegas, NV 89109

Gittleman Management Corporation
1801 American Boulevard East, Suite 21
Bloomington, MN 55425

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10400 Viking Drive, #500
Eden Prairie, MN, 55344

Downtown Resource Group
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Minneapolis, MN 55401

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Minneapolis, MN 55405

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UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re:

BKY No. 09-50779

Dennis E. Hecker,

Chapter 7

Debtor.

ORDER FOR RULE 2004 EXAMINATIONS

Randall L. Seaver, the Trustee in the above-entitled matter has applied for authorization to conduct the examinations of Jessica Robb, Harrison Prather, Harrison K-9 Security, LLC, Bellagio Las Vegas, Mirage Las Vegas, Gittleman Management Corporation, R.W. LLC, Downtown Resource Group, Holly Hecker-Aldridge and Breck School pursuant to Bankruptcy Rule 2004(a) and Local Rule 2004-1(a).

IT IS HEREBY ORDERED:

The Trustee's motion for order authorizing 2004 examinations of Jessica Robb, Harrison Prather, Harrison K-9 Security, LLC, Bellagio Las Vegas, Mirage Las Vegas, Gittleman Management Corporation, R.W. LLC, Downtown Resource Group, Holly Hecker-Aldridge and Breck School is GRANTED.

Dated: _____

Robert J. Kressel
U.S. Bankruptcy Judge